

REMARKS

This Amendment is being filed in response to the Office Action mailed December 24, 2008, which has been reviewed and carefully considered. Reconsideration and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-7, 9-14 and 20-32 are pending in the application, where claims 8 and 15-19 have been canceled without prejudice and claims 29-32 have been added by the present amendment. Claims 1 and 22 are independent. Applicants reserve the right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or continuing applications.

By means of the present amendment, the current Abstract has been deleted and substituted with the enclosed New Abstract which better conforms to U.S. practice.

By means of the present amendment, claims 1-7, 9-14 and 20-26 have been amended for non-statutory reasons, such as for better form including beginning the dependent claims with 'The' instead of

'A', and deleting reference numerals typically used in European practice that are known to not limit the scope of the claims. Such amendments to claims 1-7, 9-14 and 20-26 were not made in order to address issues of patentability and Applicants respectfully reserve all rights under the Doctrine of Equivalents.

In the Office Action, claims 1-12 and 20-28 are rejected under 35 U.S.C. §102(b) over U.S. Patent No. 6,570,325 (Graff). Further, claims 1, 13-19 and 21 are rejected under 35 U.S.C. §102(b) over U.S. Patent Application Publication No. 2003/0003225 (Choi). It is respectfully submitted that claims 1-7, 9-14 and 20-32 are patentable over Graff and Choi for at least the following reasons.

Graff is directed to an encapsulated organic light emitting device. As clearly shown in FIGs 1-3, the various layers are planar.

Choi is directed to a method of fabricating an organic electroluminescent display. Similar to Graff, the various layers shown in FIGs 1-3 of Choi are also planar, except for the most outer layer.

In stark contrast, the present invention as recited in

independent claim 1, and similarly recited in independent claim 22, amongst other patentable elements recites (illustrative emphasis provided):

a dielectric sealing structure that seals protruding structures, the dielectric sealing structure being non-planar and conforming to a shape of the protruding structures; and
stabilization layer located over the dielectric sealing structure to form a substantially planar surface.

A non-planar dielectric sealing structure that conforms to the shape of the protruding structures, where a substantially planar stabilization layer is located over the non-planar dielectric sealing structure, is nowhere disclosed or suggested in Graff and Choi, alone or in combination.

Accordingly, it is respectfully submitted that independent claims 1 and 22 are allowable, and allowance thereof is respectfully requested. In addition, it is respectfully submitted that claims 2-7, 9-14, 20-21 and 23-32 should also be allowed based at least on their dependence from independent claims 1 and 22 as well as their individually patentable elements. Accordingly, separate consideration of each of the dependent claims is


respectfully requested.

For example, assuming arguendo that Graff discloses similar material, there is still no disclosure or suggestion that the particular selected material for two layers have substantially the same thermal expansion coefficients, as recited in claims 10 and 31.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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